

MAR 21 2025

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY \_\_\_\_\_  
DEPUTY CLERK

6/24

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION

CONTIQUE WILLCOT, )  
                          )  
Plaintiff,            )  
                          )  
v.                     )                           CASE NO. 24-cv-00317-DC-RCG  
                          )  
                          )  
SECURITIES AND EXCHANGE )  
COMMISSION, et al.    )  
                          )  
Defendants.            )  
                          )

---

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO THE  
AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (“FRCP”), Defendant Next Bridge Hydrocarbons, Inc. (“NBH”) requests a 45-day extension of time to May 8, 2025 to respond to Plaintiff’s Second Amended Complaint (ECF 12).

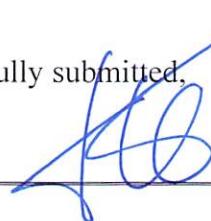
In support of this motion, NBH states as follows:

1.     This motion is NBH’s first request for an extension of time with respect to this time limitation.
2.     Counsel for NBH has conferred with pro se Plaintiff, and he consented to the requested extension of the deadline to respond to the Second Amended Complaint. Defendant Securities and Exchange Commission is the only other party to have made an appearance at this time.
3.     NBH requests the additional time to prepare its response to the Second Amended Complaint because of its breadth. On December 30, 2024, Plaintiff filed an Amended Complaint.

The Amended Complaint is 78 pages with 285 numbered allegations. The Amended Complaint further has 8 counts and seeks declaratory relief on a variety of statutory and constitutional bases.

WHEREFORE, NBH respectfully moves for an extension of time from March 24, 2025, to and including May 8, 2025, to move to dismiss or otherwise respond to the Second Amended Complaint.

Respectfully submitted,



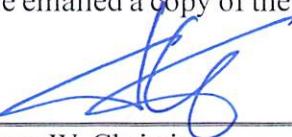
Date: March 19, 2025

James W. Christian  
Texas Bar No. 04228700  
(Pro Hac Vice Pending)  
*jchristian@christianattarlaw.com*  
Casidy Newcomer  
Texas Bar No. 24121033  
(Pro Hac Vice Pending)  
*cnewcomer@christianattarlaw.com*  
**CHRISTIANATTAR**  
1177 West Loop S, Suite 1700  
Houston, Texas 77027  
(713) 659-7617 telephone  
(713) 659-7641 fax

**ATTORNEYS FOR DEFENDANT  
NEXT BRIDGE HYDROCARBONS,  
INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of March, 2025, I caused to be filed the foregoing through FedEx delivery to the Clerk of Court and I have emailed a copy of the foregoing to Plaintiff and all counsel of record.



---

James W. Christian